



Co-Chairperson: Jim McKenna, Port of Portland
Co-Chairperson: Bob Wyatt, NW Natural
Treasurer: Fred Wolf, Legacy Site Services for Arkema

June 11, 2008

Chip Humphrey
Eric Blischke
U.S. Environmental Protection Agency, Region 10
805 SW Broadway, Suite 500
Portland, OR 97205

Re: May 23, 2008 Data Quality Objectives for Osprey Egg Sampling (Lower Willamette River, Portland Harbor Superfund Site, USEPA Docket No: CERCLA-10-2001-0240)

Chip and Eric:

In your letter of May 23, 2008 you requested the Lower Willamette Group (LWG) to fund the chemical analysis of osprey eggs collected in Portland Harbor this spring by the United States Geological Survey. Your letter states: "The purpose of the egg monitoring is to establish baseline conditions as a part of a long term monitoring program that may, along with other monitoring parameters, be useful for monitoring long-term effectiveness of Portland Harbor sediment cleanup activities. In addition, the data should be evaluated to determine if they are useful for refining the evaluation of bird eggs in the baseline ecological risk assessment (BERA)." The "remedial investigation monitoring" objectives for contaminants in osprey eggs included with your letter further states: "The objectives for the collection and analysis of osprey eggs are to:

1. Compare egg health parameters (contaminant concentrations and eggshell thickness) over time to baseline values established for eggs collected prior to remediation efforts; and
2. Compare egg contaminant concentrations and eggshell thinning to threshold effect values."

The LWG has technical concerns regarding the appropriateness of using chemical monitoring of osprey eggs as a long term monitoring tool. The LWG further understands that osprey egg monitoring is already being supported under other Trustee programs. Additionally, it is unclear to us how the egg analysis results could be included in the BERA given the timing of the egg collection and analysis relative to the data lockdown for the BERA, which occurred on June 2, 2008. To that end, it would assist us if we could get further clarification as soon as possible from EPA as to what it intends that this risk assessment would entail.

The LWG requests that a copy of the sampling plan for the egg collection effort be provided to us as soon as possible. We would like to meet with you soon to discuss our concerns and obtain clarification of your objectives for remedial investigation monitoring of osprey eggs.

Sincerely,



Jim McKenna
LWG Co-Chair



Bob Wyatt
LWG Co-Chair

cc: Confederated Tribes and Bands of the Yakama Nation
 Confederated Tribes of the Grand Ronde Community of Oregon
 Confederated Tribes of Siletz Indians of Oregon
 Confederated Tribes of the Umatilla Indian Reservation
 Confederated Tribes of the Warm Springs Reservation of Oregon
 Nez Perce Tribe
 Oregon Department of Fish & Wildlife
 United States Fish & Wildlife
 Oregon Department of Environmental Quality
 LWG Legal
 LWG Repository